

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

---

CITY OF POMPANO BEACH : Civil Action No. 1:09-cv-01811-JOF  
GENERAL EMPLOYEES' :  
RETIREMENT SYSTEM, Individually : **CLASS ACTION**  
and on Behalf of All Others Similarly :  
Situated, :  
Plaintiff, :  
vs. : **STIPULATION AND PROPOSED  
BRIEFING SCHEDULING ORDER**  
SYNOVUS FINANCIAL CORP., :  
RICHARD E. ANTHONY, :  
FREDERICK L. GREEN, III, :  
THOMAS J. PRESCOTT, and MARK :  
G. HOLLADAY, :  
Defendants. :  
X

---

IT IS HEREBY STIPULATED, subject to approval by the Court, by and between undersigned counsel for Plaintiff City Of Pompano Beach General Employees' Retirement System ("Plaintiff") and Defendants Synovus Financial Corp., Richard E. Anthony, Frederick L. Green, III, Thomas J. Prescott, and Mark G. Holladay (collectively, the "Synovus Defendants"), as follows:

1. This is a putative securities class action brought against the Synovus Defendants for alleged violations of the Securities Exchange Act of 1934 (“Complaint”);

2. The Synovus Defendants have agreed to accept service of the Complaint and hereby affirmatively preserve all defenses and objections thereto;

3. This action is governed by the Private Securities Litigation Reform Act (“PSLRA”), which requires the Court to appoint a lead plaintiff and approve lead plaintiff’s selection of lead counsel;

4. In the event there are no competing motions for appointment of lead plaintiff, in the interest of time and efficiency, the parties agree to contact the Court for entry of an Order appointing lead plaintiff and approving lead plaintiff’s selection of lead counsel;

5. Upon entry of an Order appointing lead plaintiff and approving lead plaintiff’s selection of lead counsel (“Lead Plaintiff Order”), lead plaintiff shall have 45 days from the date of the Lead Plaintiff Order within which to file and serve a Consolidated Complaint;

6. The Synovus Defendants shall have 45 days thereafter to respond to lead plaintiff’s Consolidated Complaint;

7. In the event the Synovus Defendants move to dismiss the Consolidated Complaint, lead plaintiff shall have 45 days thereafter within which to file and serve any opposition to the Synovus Defendants' motion(s) to dismiss; and

8. The Synovus Defendants shall have 30 days thereafter within which to file and serve any reply in support of any motion(s) to dismiss;

9. All discovery-related deadlines under the Local Rules (including deadlines for conducting Rule 26(f) discovery planning conference, exchanging initial disclosures, and filing the Joint Preliminary Report and Discovery Plan) shall be stayed pending the outcome of the motion(s) to dismiss.

IT IS HEREBY ORDERED THAT the parties shall comply with the above stipulated briefing schedule.

SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2009.

---

HONORABLE J. OWEN FORRESTER  
United States District Court

DATED: August 18, 2009

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
JOHN C. HERMAN  
(Georgia Bar No. 348370)

/s/ John C. Herman  
JOHN C. HERMAN

Monarch Centre, Suite 1650  
3424 Peachtree Road, N.E.  
Atlanta, GA 30326  
Telephone: 404/504-6500  
404/504-6501 (fax)

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
PAUL J. GELLER  
JACK REISE  
STEPHEN R. ASTLEY  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: 561/750-3000  
561/750-3364 (fax)

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
DARREN J. ROBBINS  
DAVID C. WALTON  
655 West Broadway, Suite 1900  
San Diego, CA 92101-3301  
Telephone: 619/231-1058  
619/231-7423 (fax)

COHEN & RIND, P.A.  
RONALD J. COHEN  
8100 Oak Lane, Suite 403  
Miami Lakes, FL 33016  
Telephone: 305/823-1212  
305/823-7778 (fax)

Attorneys for Plaintiff

ALSTON & BIRD LLP  
JOHN L. LATHAM  
(Georgia Bar No. 438675)  
KELLY C. WILCOVE  
(Georgia Bar No. 185682)  
BRANDON R. WILLIAMS  
(Georgia Bar No. 760888)

/s/ Kelly C. Wilcove

1201 West Peachtree Street  
Atlanta, GA 30309-3424  
Telephone: 404/881-7000  
404/881-7777 (fax)

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

---

CITY OF POMPANO BEACH : Civil Action No. 1:09-cv-01811-JOF  
GENERAL EMPLOYEES' :  
RETIREMENT SYSTEM, Individually : CLASS ACTION  
and on Behalf of All Others Similarly :  
Situated, :  
: Plaintiff, :  
: :  
vs. :  
: :  
SYNOVUS FINANCIAL CORP., :  
RICHARD E. ANTHONY, :  
FREDERICK L. GREEN, III, :  
THOMAS J. PRESCOTT, and MARK :  
G. HOLLADAY, :  
: Defendants. :  
x

---

**CERTIFICATE OF SERVICE**

I hereby certify that on this date the foregoing Stipulation and Proposed Briefing Scheduling Order was filed electronically with the Clerk of Court and a copy of the foregoing was mailed via First Class Mail to the following:

John C. Herman  
COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
Monarch Centre, Suite 1650  
3424 Peachtree Road, N.E.  
Atlanta, GA 30326

Paul J. Geller  
Jack Reise  
Stephen R. Astley  
COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432

Darren J. Robbins  
David C. Walton  
COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101-3301

Ronald J. Cohen  
COHEN & RIND, P.A.  
8100 Oak Lane, Suite 403  
Miami Lakes, FL 33016

This 18th day of August, 2009.

/s/ Kelly C. Wilcove  
Kelly C. Wilcove